

ANCHORAGE WATER & WASTEWATER UTILITY



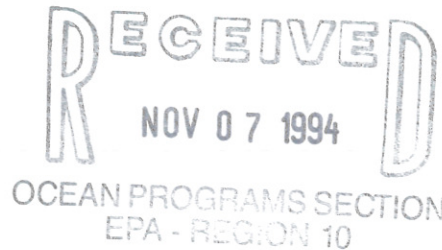
Rick Mystrom,
Mayor

3000 Arctic Boulevard
Anchorage, Alaska 99503-3898



Owned by the
Municipality of Anchorage

November 2, 1994



Mr. Chuck Clarke
Regional Administrator
U.S. Environmental Protection Agency, Region X
1200 Sixth Ave.
Seattle, WA 98101

RE: Intent to Submit Revisions to the 301(h) Waiver Application: Pretreatment Program Requirements.

Dear Mr. Clarke:

The Point Woronzof Wastewater Treatment Facility (POTW), operated by the Municipality of Anchorage (MOA), intends to submit a revision of our 301(h) waiver application, dated April 12, 1990 to update the Urban Area Pretreatment Program portion of the permit application. MOA has operated the Pt. Woronzof POTW under NPDES permit and 301(h) waiver AK-002255-1 since 1985. Reapplication for that permit, including a complete pretreatment program plan, was submitted in 1990. We now intend to update that application based on the August 9, 1994 modifications to 40 CFR Part 125 that include requirements for modifications to pretreatment programs.

Most of the standard components required for the POTW pretreatment program are already in place as part of the existing 301(h) waiver application. Certain aspects of the program may require modification or possible improvements. The sections of the POTW pretreatment program and the planned revisions of the application by MOA are as follows:

1) Industrial User Survey:

- The industrial survey is **in place** and is upgraded and documented annually to EPA. MOA will continue this program.

2) POTW Influent/Effluent/Sludge Monitoring:

- The monitoring and reporting program to EPA is **in place** and MOA will continue the program.

3) Local Limits Set for Known or Suspected Discharges of Toxic Pollutants:

- Local limits have been set for arsenic and heavy metals for both categorical and other industrial dischargers.
- As part of the revised application, **MOA proposes to examine** all 126 priority pollutants based on 40 CFR Part 403 analysis and document the reasoning behind decisions to permit or not permit dischargers for each potentially significant pollutant. The revised application will document the results of this analysis.

4) IMPs, BMPs, and Monitoring for Pollutants Not Requiring Local Limits:

- The IMP and BMP programs for pollutant reduction **will be reviewed** for possible improvements.

5) Annual Pretreatment Performance Report:

- The annual report documenting compliance actions and enforcement activities **is already in place.**

6) Significant Noncompliance (SNC) Held to Less than 15%:


- MOA proposes to **review existing enforcement methods** and to **investigate new techniques** to decrease the frequency of SNC and increase the effectiveness of enforcement actions with the goal of bringing SNC within EPA guidelines.

7) Specific Prohibitions Concerning Worker Safety, Flow Blockage, Air Quality Regulations Concerning Sludge Incineration, and Biological Inhibition:

- This program is **in place**, performing adequately, and will be continued.

The plan for these suggested revisions to the 301(h) waiver application for the Pt. Woronzof POTW will be completed within six months.

Sincerely,


Mark Premo, P.E.
General Manager